

## **AFFIDAVIT OF PROBABLE CAUSE**

I, Connor Donahue, being duly sworn, hereby depose and state as follows:

1. I am a United States Postal Inspector, assigned to the Harrisburg Domicile, Philadelphia Division of the United States Postal Inspection Service (“USPIS”), and have been so employed since June 2023. As part of my duties as a U.S. Postal Inspector, I investigate violations of criminal statutes relating to the United States Postal Service (“USPS”) and its employees.

2. Before joining USPIS, I served as a Special Agent with Homeland Security Investigations from 2020-2023.

3. I have completed two federal law enforcement academies: (1) The Federal Law Enforcement Training Center’s Criminal Investigator Training Program in Glynco, Georgia; and (2) Homeland Security Investigation’s Special Agent Training in Glynco, Georgia. I received a Bachelor of Arts degree in Political Science from the University of California, Los Angeles.

4. The facts in this affidavit come from my personal observations, my training and experience, and information obtained from other agents and witnesses. This affidavit does not set forth all my knowledge about this matter; it is intended to show that probable cause exists for the requested warrant.

**BASIS FOR FACTS CONTAINED IN THIS AFFIDAVIT**

5. I make this affidavit, in part, based on personal knowledge derived from my participation in this investigation and, in part, based upon information from the following sources: oral and written reports prepared by me or other law enforcement officers, surveillance video, License Plate Readers, and witness interviews.

6. Except where otherwise noted, the information herein was provided to me directly or indirectly by witnesses and other law enforcement officers. Unless otherwise noted, wherever in this affidavit I assert that a statement was made, the information was provided by another law enforcement officer (who may have had either direct or hearsay knowledge of the statement) to whom I have spoken or whose report I have read and reviewed. Such statements are among many

statements made by others and are stated in substance, unless otherwise indicated.

7. I do not set forth every fact that I have learned about during this investigation. Rather, I set forth only the facts that I believe are necessary to establish probable cause for the issuance of a search warrant.

8. Based on the facts set forth in this affidavit, there is probable cause to believe that violations of 18 U.S.C. § 510 (forging endorsements on Treasury checks or bonds or securities of the United States), 18 U.S.C. § 1028 (fraud and related activity in connection with identification documents, authentication features, and information), 18 U.S.C. § 1341 (frauds and swindles), and 18 U.S.C. § 2315 (sale or receipt of stolen goods, securities, moneys, or fraudulent State tax stamps), have been committed and attempted, are being committed, and will be committed or attempted by Jeremiah Dent, Leanna Baines, Tania White, and possibly other currently unknown individuals.

9. There is also probable cause to believe that a search of the Subject Vehicle referenced in **Attachment A**, that is, a gray in color 2023 Nissan Sentra with Georgia License Plate CWW4841 and VIN 3N1AB8DV8PY256117 will reveal evidence of the above-referenced criminal violations and items requested to be seized in **Attachment B**.

### **PROBABLE CAUSE**

10. On or about **November 3, 2023**, at approximately 1440 hours, a female suspect ("Suspect 1") entered the United States Post Office located at 9 N Ronks Rd, Ronks, Lancaster County, PA 17572, presented a United States Treasury Check for \$3,312.00, and presented a synthetic New York driver license that had information matching the information on the check. The check was negotiated into four USPS money orders.

11. On the same date, at approximately 1510 hours, Suspect 1 entered the United States Post Office located at 1638 Lampeter Rd, Lampeter, Lancaster County, PA 17537, presented a United States Treasury Check for \$4,730.00 that was converted into five USPS money orders.

12. On the same date, at 1530 hours, Suspect 1 entered the United States Post Office located at 6 Violet Ave, Willow Street, Lancaster County, PA 17584, and was unable to negotiate a U.S. Treasury Check due to technical issues at the Post Office.

13. On or about **November 17, 2023**, at approximately 1225 hours, Suspect 1 entered the United States Post Office located at 452 Dewart St, Riverside, Northumberland County, PA 17868, presented a United States Treasury Check for \$1,142.00, and presented a synthetic New York driver license with identifying information that matched information on the check. The check, in turn, was negotiated into two USPS money orders.

14. On the same date, at approximately 1253 hours, Suspect 1 entered the United States Post Office located at 410 Mill St, Danville, Montour County, PA 17821, presented a United States Treasury Check for \$1,146.72, and presented a New York identification Card that matched the name and address on the presented check. The treasury check, in turn, was negotiated into two USPS money orders.

15. On the same date, at approximately 1315 hours, a male suspect ("Suspect 2") entered the same Riverside, PA post office and attempted to present a United States Treasury Check for negotiation into a USPS money order. The clerk, however, denied the transaction, at which point Suspect 2 ran out of the Post Office.

16. On the same date, at approximately 1416 hours, Suspect 1 entered the United States Post Office located at 121 N 3rd St, Catawissa, Columbia County, PA 17820, presented a United States Treasury Check for \$3,971.88, and presented a New York identification card. The check was negotiated into four USPS money orders.

17. On the same date at approximately 1515 hours, Suspect 1 entered the United States Post Office located at 230 Market St, Bloomsburg, Columbia County, PA 17815, presented a United States Treasury Check for \$3,981.00, and presented a New York identification card. The check was negotiated into four USPS money orders.

18. On the same date, at approximately 1540 hours, Suspect 2 entered the same Catawissa, PA post office, presented a United States Treasury Check for \$1,571.00, and presented a New York Identification Card. The check was negotiated into two USPS money orders.

19. United States Postal Inspectors responded to the above-referenced post offices. Inspectors interviewed all Clerks who interacted with the Suspects.

20. A Clerk from the Riverside post office identified the suspects' vehicle as a gray in color Nissan Sentra bearing Georgia License Plate CWW4841. This same vehicle was identified by and captured via cell phone photo by the Clerk at the Catawissa Post Office later that same date.

21. Video surveillance footage also was available from the Catawissa Post Office that captured both Suspects when they individually entered the Post Office.

22. On or about **November 28, 2023**, at approximately 1405 hours, Suspect 2 entered the United States Post Office located at 1 Sullivan Ave, Eagles Mere, Sullivan County, PA 17731 and attempted to negotiate a U.S. Treasury Check in the amount of \$4484.43 that was made out to a David Geffen of 111 Steuben St, APT 4A, Brooklyn, NY 11205. Suspect 2 presented a fake New York driver license bearing the same name and address as the U.S. Treasury Check, but with Suspect 2's photo and the remainder of the information being fake.

23. The Post Office was unable to process the transaction and directed Suspect 2 to the Picture Rocks Post Office.

24. On the same date at approximately 1425 hours, Suspect 2 entered the United States Post Office located at 21 Laurel Run Rd, Picture Rocks, Lycoming County, PA 17737, with the same United States Treasury Check and New York driver license described above, and attempted to negotiate the Treasury Check in to a Postal Money Order.

25. The Picture Rocks Post Office also was unable to complete the transaction and directed Suspect 2 to the Hughesville Post Office.

26. On the same date at approximately 1445 hours, Suspect 2 entered the United States Post Office located at 44 N Main St, Hughesville, Lycoming County, PA 17737, with the same U.S. Treasury Check and New York driver license described above, attempting to negotiate the check into a Postal money order.

27. The Hughesville Post Office declined to complete the transaction. Suspect 2 left.



28. On the same date at 1554 hours, Suspect 2 entered the United States Post Office located at 316 Main St, Watsonstown, PA 17777, with the same U.S. Treasury Check and New York driver license described above, attempting to negotiate the check into a Postal money order.

29. The Clerk took the New York driver license and check and went to the Watsonstown Police Station (adjacent to the post office) to advise of suspected fraud.

30. Watsonstown Officers responded to the Watsonstown Post Office, detained Suspect 2 (identified as Jeremiah Dent), and took him to the Watsonstown Police Station.

31. Further investigation by a Milton Police Officer located the suspects' vehicle, i.e., the Subject Vehicle, in the same block as the Watsonstown Post Office.

32. Two females, Suspect 1 (identified as Leanna Baines) and Tania White, were in the Subject Vehicle. They were identified and detained, and the Subject Vehicle was impounded.

33. White chose to speak with the undersigned after receiving *Miranda* warnings.

34. White told the affiant the following, in relevant part:

- a. On or about Monday, November 27, 2023, she met Dent through Baines for the first time. Dent told White about an opportunity to make money. White subsequently allowed Dent to take her photograph to create a synthetic identification card.
- b. On or about Tuesday, November 28, 2023, Dent and Baines picked White up from her residence at approximately 0824 hours, and the three suspects drove to Pennsylvania. According to White, Dent possessed numerous identification cards and checks. One of the identification cards had White's photo on it but in a different name. White further told the affiant that those documents were in the Subject Vehicle.

35. Based on the foregoing, as well as my training and experience, I believe that a search of the Subject Vehicle will reveal relevant evidence, to include illegally obtained United States Treasury Checks, USPS money orders, falsified identification cards, falsified driver licenses, mail belonging to others, and victim information.

#### **AUTHORIZATION REQUEST**

36. Based on the foregoing, I request the Court to issue the proposed search warrant under Federal Rule of Criminal Procedure 41.

**ATTACHMENT A**

**Item to be Searched**

I request authority to search a gray in color 2023 Nissan Sentra with Georgia License Plate CWW4841 and VIN 3N1AB8DV8PY256117.

## **ATTACHMENT B**

### **Particular Things to be Seized**

All evidence of violations of 18 U.S.C. § 510 (forging endorsements on Treasury checks or bonds or securities of the United States), 18 U.S.C. § 1028 (fraud and related activity in connection with identification documents, authentication features, and information), 18 U.S.C. § 1341 (frauds and swindles), 18 U.S.C. § 2315 (sale or receipt of stolen goods, securities, moneys, or fraudulent State tax stamps), and related offenses, including United States Treasury Checks, money orders, identification cards, driver licenses, mail belonging to others, victim information, as well as other fruits of the crimes and property designed for use, intended use, or used in committing the crimes.